

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

UNITED STATES OF AMERICA, ex rel.)
CAMERON JEHL,)
)
Plaintiffs,)
)
v.)
)
GGNSC SOUTHAVEN LLC D/B/A GOLDEN)
LIVINCENTER-SOUTHAVEN; GGNSC)
ADMINISTRATIVE SERVICES LLC D/B/A)
GOLDEN VENTURES; AND GGNSC)
CLINICAL SERVICES LLC D/B/A GOLDEN)
CLINICAL SERVICES,)
)
Defendants.)

No. 3:19-cv-091-GHD-JMV

**PLAINTIFF-RELATOR'S MOTION TO ENFORCE SETTLEMENT AGREEMENT
AND DISTRIBUTE THE APPEAL BOND FUNDS IN THE COURT'S REGISTRY IN
ACCORDANCE WITH THE SETTLEMENT**

The Plaintiff-Relator moves for an order distributing one million dollars (\$1,000,000.00) of the appeal bond in the Registry of the Court to the Defendants and the remaining \$192,807.15 plus interest back to the Relator to satisfy a binding settlement agreement reached by the parties on August 12, 2024 through written correspondence. Unfortunately, the Defendants subsequently refused to go forward with the settlement unless the Relator complied with conditions they added after the fact that are irrelevant, unreasonable, and appear to violate the Mississippi Rules of Professional Conduct. Because the case law and the correspondence demonstrate the agreement was final before the Defendants added the new conditions, the Relator is moving to distribute the appeal bond in accordance with the agreement. This is all explained more fully in the memorandum filed in support of this motion.

Attached to this motion are the following exhibits:

Exhibit No. 1: E-mail correspondence from August 7, 2024, and August 8, 2024.

Exhibit No. 2: E-mail correspondence from August 9, 2024, and August 12, 2024.

Exhibit No. 3: E-mail correspondence from August 12, 2024, at 11:31 AM, 1:50 PM, and 2:11 PM.

Exhibit No. 4: E-mail correspondence from August 12, 2024, from 4:40 PM to 9:11 PM.

Exhibit No. 5: Draft Stipulation by Robert McDuff, with Emily Gerry edits agreed to by Robert McDuff.

Exhibit No. 6: Draft Proposed Order by Robert McDuff, with minor Emily Gerry edits agreed to by Robert McDuff.

Exhibit No. 7: Defendants' Draft Settlement Agreement (sent by Emily Gerry via e-mail on August 12, 2024, at 5:07 PM).

Exhibit No. 8: E-mail correspondence from Robert Salcido on August 12, 2024, at 9:29 PM.

Exhibit No. 9: E-mail correspondence from August 13, 2024, and August 14, 2024.

Exhibit No. 10: E-mail correspondence from August 16, 2024, August 19, 2024, August 27, 2024, September 8, 2024, and September 9, 2024.

Respectfully submitted,

/s/ Robert B. McDuff
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Counsel for Relator

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of September, 2024, the foregoing was served on all counsel of record by operation of the Court's electronic filing system.

/s/ Robert B. McDuff -
Counsel for Relator